



The Honorable Elaine L. Chao  
Secretary of Transportation  
United States Department of Transportation  
1200 New Jersey Avenue, S.E.  
Washington, DC 20590

Attn: Blane A. Workie, Assistant General Counsel for Aviation Enforcement Proceedings

**Re: Submission in NABR v. United Airlines et al. Docket No. DOT-OST-2018-0124**

Dear Madam Secretary:

The American Veterinary Medical Association is the professional membership organization representing more than 91,000 veterinarians in the United States and around the world. Our members are engaged in a variety of careers and include many who are involved in the conduct of biomedical research to improve animal and/or human health. This letter is to encourage you to closely review and consider the challenges posed when multiple major airlines selectively refuse transportation of animals for research purposes.

Currently, air transport is necessary to ensure that animals that play a key role in research can be moved in a humane manner to where they are needed. These animals include genetically unique rodents and nonhuman primates that are critical to advancing scientific knowledge that leads to treatments and cures for diseases and conditions, including cancer, stroke, diabetes, and heart disease. These treatments and cures benefit human and animal patients alike. Without air transport, this research cannot be conducted and, in turn, significant advancements in human and veterinary medicine are impeded or simply may not happen. United States federal agencies are the major funders of biomedical research, are responsible for regulating the use of animals in research, and their regulations require that new drugs be tested in animals before proceeding to human clinical trials. This work is predicated upon, and facilitated by, having access to purpose-bred animals from around the world. For these reasons, the American Veterinary Medical Association asks that you work to prevent commercial airlines from enacting policy that discriminates against the transport of research animals, while accommodating the transport of animals for other purposes.

We respectfully request that the DOT take this action to ensure that researchers continue to have access to animals for use in biomedical research. This research is critical to ensuring continued improvements in animal and human health.

If you have questions about the AVMA's comments and concerns as expressed in this letter, please contact Dr. Gail Golab, Chief Veterinary Officer, at 847-285-6618 or via e-mail to [ggolab@avma.org](mailto:ggolab@avma.org).

Sincerely,

Janet D. Donlin, DVM, CAE  
Executive Vice President and Chief Executive Officer

EM/ML/CLJ/GCG